

COUNT TWO

The SPECIAL FEBRUARY 2017 GRAND JURY further charges:

On or about April 7, 2017, at Willowbrook, in the Northern District of Illinois,
Eastern Division,

IESHA STANCIEL and
CAMERON BATTISTE,

defendants herein, having previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting interstate commerce a firearm, namely, a Smith & Wesson, M&P-15 Sport II CA assault rifle bearing serial number TE38718, and a Smith & Wesson, Model SDV9E 9 mm pistol bearing serial number FYJ7552, which firearm had traveled in interstate commerce prior to their possession of it,

In violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATION

The SPECIAL FEBRUARY 2017 GRAND JURY further charges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 922(g), as set forth in this Indictment, defendants shall forfeit to the United States of America any firearm and ammunition involved in and used in the offense, as provided in Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).
2. The property to be forfeited includes, but is not limited to: a Smith & Wesson, M&P-15 Sport II CA assault rifle, bearing serial number TE38718; a Smith & Wesson, Model SDV9E 9 mm pistol bearing serial number FYJ7552; and associated ammunition.

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY